

Agenda

Status of Arroyo Grande

Status of other AE proposals – Round Mountain – Main and Coffee Canyon; Tejon - Western

List of questions/comments for discussion

Questions/Comments Comparing Attachment A from October 15, 2015 letter and Attachment 1 “Preliminary Assessment of 11 Aquifers HTAE” from July 15, 2015 letter

1. API 029181136 – Attachment A states the Walker Formation is exempt; however this formation is not exempt in the Round Mountain Field.
2. API 029181114 and API 029181119 – these wells are injecting into the Olcese Formation which is an HTAE zone in the Round Mountain Field, but the wells are not marked as HTAE wells on Attachment A.
3. Differences between Attachment 1 July 15 and Attachment A October 15:
 - Kern River Field, Chanac – 12 or 13 wells into Chanac? All of the wells into both the Santa Margarita and the Chanac, or only 10?
 - Kern River Field – 32 or 36 wells into the Santa Margarita? 10 or 13 into both the Santa Margarita and the Chanac?
 - Round Mountain Field, Olcese – 4 wells permitted into both the Olcese and Walker **AND** Freeman-Jewett zones?
 - Round Mountain Field, Walker – 29 or 30 wells into the Walker?
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Question/Comment on the Oct 15 176 wells letter:

1. Attachment A of the October 15 letter indicates the state intends to treat all of the wells which inject into the HTAE formations as Category 3 wells subject to the February 2017 shut in deadline rather than the December 31, 2016 deadline.

Questions/Comments on the Oct 21 Water Board letter:

1. Why were NOV's not issued when the operator was late in responding or didn't respond at all? For example, see well #s 21 and 34-40.
2. What was the rationale for WB to issue NOV's for certain violations and not all violations? For example, some operators submitted work plans and/or technical reports late and did not receive a NOV (see wells #21, 22, 23, and 28 as examples) and other operators submitted work plans and/or technical reports late and received NOV's (see wells 2-4, 6-8, 10, etc.).
3. Well #2 on the list of 40 --an incomplete technical report was delivered to WB on 8/1/2014 and a revised one (final) was delivered to the WB on 9/9/2014; however, the reason for a NOV is an incomplete technical report? Does this mean the final technical report is also incomplete?

Questions on the Oct 15, 2015 CAT 2 letter versus the July 31 letter Category 2 letter

1. Explain how the count went from 24 wells of concern to 6.

Questions from QA of 176 table QA (by Cadmus)

1. In general, how does DOGGR plan (or do they plan to update their website) to update their website to reflect revised well data (e.g. status – active, idle, shut-in, etc., or type of well-disposal, EOR, etc.)?

For example, API #02918119 – MacPherson Oil Company, Round Mountain, Attachment A to your October 15, 2015 letter indicates that this well was plugged on June 4, 2015, and the website does show that this well is plugged and abandoned, but no date or paperwork to document this well was plugged and abandoned on June 4, 2015. In addition, on DOGGR's website, injection data was reported for this well in August 2015. How is this well plugged and abandoned and still providing injection data? How does DOGGR confirm that this well is actually plugged and abandoned?

2. There are discrepancies between the well data provided to EPA and the well data provided on DOGGRs Website. Attachment A to your October 15 letter should have the most recent or updated data, assuming this data is coming from information orders and more recent data than what is provided on DOGGRs website. How is DOGGR handling these discrepancies and documenting where the data is coming from (e.g., info orders, website, etc)?
 - For example, API # 02947362 – MacPherson Oil Company, Round Mountain, there is a discrepancy as to the type of well – Disposal (WD) or water flood (WF); In Attachment A to the October 15 letter, the current status for this well is WD and is injecting into a hydrocarbon bearing formation. In addition, DOGGR's website indicates this well is a WF not a WD, and the last injection was in 2010. What is the correct status of this well?
 - Another example, API # 03044445 – CMO, Inc. In Attachment A to the October 15 letter, the status for this well is a shut-in order has been issued by DOGGR. However, DOGGR's website indicates that this well is an O&G well, not an injection well.